

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
ROBERT MCILHENNY :
: :
Debtor(s) : CASE NO. 5-16-04395

ROBERT MCILHENNY :
MOVANT :
VS. :
CHARLES J. DEHART, III, ESQ. :
RESPONDENT :

MOTION TO SUSPEND TEMPORARILY TRUSTEE PAYMENTS

AND NOW COMES, the Debtor, Robert McIlhenny, by and through his attorney, Tullio DeLuca, Esquire, and respectfully represents:

1. That the Debtor filed a Chapter 13 Petition on October 25, 2016.
2. That Debtor's Chapter 13 Plan provides for monthly payments of \$642.00

to the Chapter 13 Trustee to pay attorney and Trustee fees and secured creditors.

3. Debtor was hospitalized which resulted in a decrease in monthly income and increase in monthly expenses.

4. Therefore, Debtor is not in a position to make the Trustee payments until his immediate problem stabilizes and regains income to satisfy the Chapter 13 Plan.

5. In light of the above Debtor requests a Temporary Suspension of his Trustee payments for a period of three (3) months or earlier starting in the month of February 2020. If Debtor's immediate problem stabilizes, Debtor will commence Trustee payments sooner.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order allowing for a suspension of Trustee's monthly payments for a period of at least three (3) months and directing the Debtor to commence making monthly payments sooner if Debtor's immediate problem stabilizes.

Respectfully submitted,

Dated: March 26, 2020

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID # 59887
381 N. 9th Avenue
Scranton, Pa 18504
(570) 347-7764
Attorney for Debtor